

DAVID J. HARRIS, ESQUIRE
ATTORNEY FOR DEBTOR
PA S. Ct. No.: 48558
FL Bar No.: 0451207

69 Public Square, Suite 700
Wilkes-Barre, PA 18701
Telephone: (570) 823-9400
Facsimile: (570) 208-1400
E-Mail: dh@lawofficeofdavidharris.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	
JAMES J. HEFFERS	:	Chapter 13
	:	Case No.: 05:12-bk-06900
Debtor	:	

SETERUS, INC., as the authorized
subservicer for FEDERAL NATIONAL
MORTGAGE ASSOCIATION
("Fannie Mae"), Creditor

v.

JAMES J. HEFFERS
and

CHARLES J. DeHART, III, TRUSTEE

**ANSWER OF DEBTOR TO MOTION OF SETERUS, INC. FOR RELIEF
FROM THE AUTOMATIC STAY**

The Debtor, JAMES J. HEFFERS, by and through his counsel, David J. Harris, Esquire,
answers the Motion of Seterus, Inc., as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.

4. ADMITTED.
5. DENIED. Strict proof thereof is demanded for trial.
6. DENIED. Strict proof thereof is demanded for trial.
7. DENIED. Strict proof thereof is demanded for trial.
8. DENIED. Movant's averment is a conclusion of law to which no responsive pleading is required and therefore such averment is deemed denied.
9. DENIED. A responsive pleading to Movant's averment is not required.
10. DENIED. A responsive pleading to Movant's averment is not required.
11. DENIED. Strict proof thereof is demanded for trial.
12. DENIED. Strict proof thereof is demanded for trial.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

AFFIRMATIVE DEFENSES

13. Debtor hereby incorporates by reference his answers in Paragraphs 1 through 12 above as if made a part hereof.
14. There is sufficient equity in the subject property.
15. Movant is adequately protected.
16. The subject property is necessary to the Debtor for an effective reorganization.
17. There is no cause for granting the relief sought by Movant in its Motion.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

RESPECTFULLY SUBMITTED

Dated: April 13, 2017
Wilkes-Barre, Pennsylvania

By: /s/ David J. Harris
DAVID J. HARRIS, ESQUIRE